

Richard I. Dreitzer (Bar. No. 6626)
David S. Kahn (Bar No. 7038)
James T. Tucker (Bar No. 12507)
Wilson Elser Moskowitz Edelman & Dicker LLP
300 South 4th Street - 11th Floor
Las Vegas, NV 89101-6014
Telephone: (702) 727-1400
Facsimile: (702) 727-1401
Richard.Dreitzer@wilsonelser.com
David.Kahn@wilsonelser.com
James.Tucker@wilsonelser.com

Adam Paul Laxalt, Esq.
Attorney General
Theresa M. Haar (Bar No. 12158)
Senior Deputy Attorney General
555 E. Washington Ave. Ste. 3900
Las Vegas, NV 89101
thaar@ag.nv.gov
*Attorneys for Defendants The State of Nevada, ex rel.
its Department of Corrections*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DONALD WALDEN JR, NATHAN
ECHEVERRIA, AARON DICUS, BRENT
EVERIST, TRAVIS ZUFELT, TIMOTHY
RIDENOUR, and DANIEL TRACY on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

THE STATE OF NEVADA, *EX REL.* ITS
NEVADA DEPARTMENT OF CORRECTIONS,
and DOES 1-50,

Defendants.

Case No.: 3:14-cv-00320-MMD-WGC

**STIPULATION FOR ENLARGEMENT
OF TIME FOR DEFENDANT TO
FILE REPLY IN SUPPORT OF
DEFENDANTS' MOTION TO
EXCLUDE ALL EVIDENCE FROM
PLAINTIFFS' EXPERTS, THE
EMPLOYMENT RESEARCH
CORPORATION, MALCOLM COHEN
AND LAURA STEINER**

(Second Request)

AND ORDER THEREON

Defendant, STATE OF NEVADA, *EX REL.* ITS DEPARTMENT OF CORRECTIONS
("NDOC") and Plaintiffs, DONALD WALDEN, JR., NATHAN ECHEVERRIA, AARON DICUS,
BRENT EVERIST, TRAVIS ZUFELT, TIMOTHY RIDENOUR and DANIEL TRACY, on behalf
of themselves and all others similarly situated (collectively, "The Parties") by and through their
respective counsel of record, hereby stipulate and agree to extend the time for Defendant, NDOC to
file its Reply in Support of Motion to Exclude All Evidence From Plaintiffs' Experts, The

1 Employment Research Corporation, Malcolm Cohen and Laura Steiner (ECF No. 189) from
2 September 5, 2018 up to and including September 12, 2018.

3 Defendant is requesting this extension due to counsels' professional commitments and
4 existing workload.

5 This stipulation is made in good faith and is not for purpose of undue burden or delay.

6 IT IS SO STIPULATED.

7
8 DATED: September 4, 2018.

DATED: September 4, 2018.

9 **WILSON ELSE MOSKOWITZ**
EDELMAN & DICKER LLP

THIERMAN BUCK, LLP

10 BY: /s/Richard I. Dreitzer
11 Richard I. Dreitzer (Nevada Bar. No. 6626)
12 South 4th Street - 11th Floor
13 Las Vegas, NV 89101-6014
14 *Attorneys for Defendants, The State of*
Nevada, ex rel. is Department of
Corrections

BY: /s/ Leah L. Jones
Mark R. Thierman (Nevada Bar No. 8285)
Joshua D. Buck (Nevada Bar No. 12187)
Leah L. Jones (Nevada Bar No. 13161)
7287 Lakeside Drive
Reno, NV 89511
Attorneys for Plaintiffs

15
16 **ORDER**

17 **IT IS SO ORDERED.**

18 Dated this 5th day of September, 2018.

19
20
21
22
23
24
25
26
27
28


UNITED STATES DISTRICT JUDGE